UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

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UNITED STATES OF AMERICA)	
)	
V.)	No. 3:13-00119-2
)	JUDGE TRAUGER
WILLIAM M. WORTHY II (2), et al)	

MOTION FOR APPOINTMENT OF CO-COUNSEL

Undersigned counsel for Defendant (2) William Worthy II respectfully moves this Court to appoint a second Criminal Justice Act Panel ("C.J.A.") attorney to serve as co-counsel. Counsel avers that the instant case is extraordinarily complex. As set forth below, the appointment of a second attorney, and one with experience in financial, white collar federal litigation, is necessary to ensure that Mr. Worthy receives effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution.

C.J.A. Panel attorney Jonathan Farmer has almost fifteen years experience in complex criminal defense and civil litigation, including significant years of experience both with a state public defender, and in private practice. Mr. Farmer has handled many complex federal criminal cases, and has also handled civil litigation involving insurance regulations. Mr. Farmer and undersigned counsel are partners in the same law firm, Jones Hawkins & Farmer, PLC., and would thus be able to share information and resources in a more efficient manner than would be possible with appointment of counsel from a different law firm. Mr. Farmer has agreed to accept appointment in the instant case.

In support of this Motion, undersigned counsel submits the following facts and analysis, which demonstrate the complexity of the case and need for co-counsel: